

Dear FCC,

As a commercially licensed and amateur extra class licensee since 1969, I am strongly opposed to removal of any Morse Code Testing requirements then has already been done. We already have an "entry level" no code license that is easy to pass. If they want to use the HF bands which are still widely used by skilled CW operators in the lower 50Khz of each HF band, then they must become proficient in CW at least at a novice level in order to know when they are causing interference to existing QSO's. This is why some say the HF bands will be destroyed as these operators will simply not realize that they are causing interference to others, since they would not know a "QRL" signal when they heard it. It is also for this reason that no other mode except CW should ever take place on the lower 50Khz of any amateur HF band.

As for current "no code" technician licensees who want priveledges in the 80, 40, and 10 meter bands, they need to realize that CW is still around and probably always will be in ALL the HF amateur bands. After all, this is the main thing we hams can do that distinguishes us from other services not to mention in cases of emergency as a "simple to rig up" and easy to copy mode to operate. It is the trademark of amateur radio and is to this day heavily used. If you want to operate on HF, then go learn Morse Code because it is used heavily on HF.

I know many young and old amateurs alike who absolutely love CW especially when working DX countries in which they do not know the verbal language of the operator being worked. This mode is essential for DX operations in the HF bands and if we allow non-proficient operators in those parts of the bands, DXing will be all but ruined! At least do not let "no code licensees" operate in the lower 25Khz of these bands (Extra Class Only).

I realize that we need more people in the amateur services, but to remove the Morse Code requirements would all but ruin the HF bands. Perhaps this is all for not anyway, because if BPL gets authorized it will render the HF bands useless anyway. But I will still use CW on the satellites, especially when working DX. As I mentioned above we already have an entry level "no code" license that is meant to be a testing ground for the operator to see what they would like to do in amateur radio. But if they now want to have upgraded priveledges on HF, then they must do what is required and used extensively on perhaps 35% of those bands. Listen to any amateur HF band's lower 50Khz and you will hear many stations operating CW and the numbers of operators at times are near 50% of those on phone or digital modes at any given time.

I propose that no rule changes be made in regard to dropping the Morse Code requirements for obtaining an amateur HF license as per Part 97. The 5WPM test today is not enough to keep the caliber of HF operators high enough, and this was as you know, the amateur Novice class level for many years. I do not consider any operator, who only passed 5WPM and probably forgot that by now, to be competent enough to operate anywhere below .025 on any HF band. If for chance this new proposal is allowed, they should not be allowed below .025 on any HF band since that is where most of the real CW operation takes place anyway. Let them have phone and digital modes but please keep our CW bands clean, clear and quiet.

Sincerely,

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